

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE GENERAL ELECTRIC COMPANY  
FEDERAL SHAREHOLDER  
DERIVATIVE LITIGATION

Case No. 18-cv-03355 (JMF)

NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law of Nominal Defendant General Electric Company (“GE”) and Defendants Sébastien M. Bazin, W. Geoffrey Beattie, Jeffrey S. Bornstein, John J. Brennan, James I. Cash, Jr., Francisco D’Souza, Marijn E. Dekkers, John J. Flannery, Edward P. Garden, Peter B. Henry, Susan J. Hockfield, Jeffrey R. Immelt, Andrea Jung, Robert W. Lane, Risa Lavizzo-Mourey, Rochelle B. Lazarus, Lowell C. McAdam, Jamie S. Miller, Steven M. Mollenkopf, James J. Mulva, James E. Rohr, Mary L. Schapiro, Keith S. Sherin, Robert J. Swieringa, James S. Tisch and Douglas A. Warner III in support of their motion to dismiss the complaint, the Declaration of Greg A. Danilow, and all prior papers and proceedings herein, GE and the defendants will move this Court, before the Honorable Jesse M. Furman, United States District Judge, United States District Court for the Southern District of New York, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, on a date and at a time to be set by the Court, for an Order dismissing the complaint pursuant to Rules 12(b)(6) and 23.1 of the Federal Rules of Civil Procedure, and for such other relief as this Court may deem just and proper.

Pursuant to the Court’s August 15, 2018 Order, answering papers are required to be filed on or before September 27, 2018 and reply papers are required to be filed on or before October 12, 2018.

Dated: New York, New York  
August 17, 2018

Respectfully submitted,

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By: /s/ Greg A. Danilow

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